

ZEICHNER ELLMAN & KRAUSE LLP

1211 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10036
(212) 223-0400
FAX: (212) 753-0396
www.zeklaw.com

35 MASON STREET
GREENWICH, CT 06830
(203) 622-0900
FAX: (203) 862-9889

STEVEN S. RAND
(212) 826-5307
srand@zeklaw.com

103 EISENHOWER PARKWAY
ROSELAND, NJ 07068
(973) 618-9100
FAX: (973) 364-9960

March 17, 2015

BY ECF

Honorable Katherine B. Forrest
United States District Judge
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: March 18, 2015

**Grand Manor Health Related Facility, Inc. v. Koskinen, et al.,
Civ. No. 14-10130 (KBF)**

Dear Judge Forrest:

We are counsel to defendant Berkadia Commercial Mortgage LLC ("Berkadia") in the referenced matter. As Your Honor is aware, the parties have executed a Stipulation and Interim Stay Agreement intended to facilitate the showing and sale of the subject premises, which if successful, may enable the parties to resolve all issues in this Action.

By its terms, the Interim Stay Agreement will expire on September 4, 2015. Accordingly, we are writing to request an extension of Berkadia's time to answer the Complaint, to September 11, 2015, one week after the expiration of the Interim Stay Agreement, at which point, the parties might be in a position to settle and discontinue this action, without the need for further legal proceedings. Berkadia has previously made one request for an extension of time to answer the Complaint.

We thank the Court for its attention to this matter.

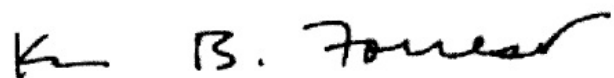
Respectfully submitted,

Steven S. Rand

SSR:mzg

cc: Roy Breitenbach, Esq. (by ECF)
John Macron, Esq. (by email)
Natasha L. Waglow, Esq. (by email)

SO ORDERED.



3/18/15

KATHERINE B. FORREST
United States District Judge